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REMARKS

1. Applicant thanks the Examiner for his remarks and observations, which have greatly assisted Applicant in responding.

2. Claims 2 and 21 are objected to due to some minor informalities observed by the Examiner. Responsive thereto, Applicant amends Claims 2 and 21 to remedy the observed informalities. As such, Applicant deems the objection overcome.

3. Claims 2-6, 13-14, 16-25, 33-34 and 36-46 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dan in view of Web Management with Microsoft Visual Sourcesafe 5.0 ("Bannick"). Applicant respectfully disagrees.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation . . . to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art must teach or suggest all the claim limitations. MPEP § 2142.

NO PRIMA FACIE CASE HAS BEEN ESTABLISHED BECAUSE THE COMBINATION FAILS TO TEACH OR SUGGEST ALL FEATURES OF CLAIMS 2 AND 21.

The Examiner relies on col. 17, lines 35-46 and col. 23, lines 108 of Dan as teaching "a tracking table configured to manage the existence and

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relationship of the delta table and the base table in the system." Applicant respectfully disagrees. What is being described is a "page manager" as shown in Dan's figure 5A. The page manager apparently allows the user to create new pages and to modify existing ones. The page manager may optionally include a revision control feature to monitor previous revisions. The page manager provides a user interface by which the user can create new pages or modify existing ones (col. 17, lines 35 to 50). Accordingly, the page manager is a wizard, or an application, or an applet. There is no teaching or suggestion of a table. Even if it could be said that the cited teaching did describe a table, the purpose of the table is to manage changes made to a web site (lines 40-44). There is no teaching or suggestion of a table configured to manage the existence and relationship of the delta table and the base table in the system. Even if the page manager were a table, and even though the page manager can track changes by means of its "track changes" feature, it cannot stand for what the Examiner says it stands for—manage the existence and relationship of the delta table and the base table—because Dan does not even contemplate the delta table. Thus, it is impossible for Dan to teach or suggest an entity that manages the relationship between a base table and a second entity the existence of which Dan doesn't contemplate or recognize.

The Examiner relies on pages 10, 86-88, 95 and 114 of Banick as teaching "a delta table that represents changes made in a work area to website content, extended attributes of said website, and information related to said website" Applicant respectfully disagrees. Pages 86-88 describe saving

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changes made to files "to the database" (¶ 3). Nothing is said about the form of the database. There is decidedly no teaching or suggestion of "a delta table." Furthermore, the cited teaching describes writing original files and changes to those files to the database. There is no teaching or suggestion in Banick of "a delta table that represents changes made in a work area to website content, extended attributes of said website, and information related to said website" Page 95 describes a change control feature, much like Dan's page manager that also has the ability to "pin" a particular revision. Accordingly, page 10 adds nothing to Dan. There is therefore no teaching or suggestion in page 10 of "a delta table that represents changes made in a work area to website content, extended attributes of said website, and information related to said website" Page 114 of Banick describes a feature for merging files created by different authors. Thus, there is no teaching or suggestion on page 114 of "a delta table that represents changes made in a work area to website content, extended attributes of said website, and information related to said website" As previously noted, Dan fails to even contemplate a delta table. Accordingly, there is no teaching or suggestion in the combination of "a delta table that represents changes made in a work area to website content, extended attributes of said website, and information related to said website" Accordingly, on this ground alone, the current rejection is deemed to be improper.

NO PRIMA FACIE CASE HAS BEEN ESTABLISHED BECAUSE NO REASONABLE EXPECTATION OF SUCCESS HAS BEEN DEMONSTRATED.

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The Examiner bears the burden of showing a reasonable expectation of success from the combination, which the Examiner has failed to do. In fact, there is no reasonable expectation of success from this combination because the Examiner expects, unreasonably, that an element from Dan, the page manager, can be modified to perform the function of the invention's tracking table—managing the existence and relationship of the base table and delta table—even though such combination would require Dan's page manager to manage a component—a delta table—that Dan doesn't even contemplate. Additionally, Banick doesn't contemplate a delta table as described in claims 2 and 21. Therefore, the Examiner has failed to demonstrate a reasonable expectation of success. On this ground alone, the current rejection is deemed to be improper.

NO PRIMA FACIE CASE HAS BEEN ESTABLISHED BECAUSE THERE IS NO MOTIVATION TO COMBINE THE TEACHINGS.

The Examiner has failed to provide a reasonable motivation for the practitioner having an ordinary level of skill in the art to make the combination. The Examiner suggests that the motivation to make the combination would be to provide a change tracking capability. However, in the form of the page manager (figure 5a) Dan already provides a change management capability. Thus, the skilled practitioner would have little motivation to look to Banick for a change management capability. Therefore, on this ground alone, the current rejection is deemed to be improper.

In spite of the above, in the interest of expediting prosecution of the application, Applicant amends claims 2 and 21 to describe "a delta table

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associated with a work area that represents changes made in said work area to website content, extended attributes of said website, and information related to said website." Support for the amendment is found in the specification-as-filed at page 7, lines 16-19. No new matter has been added by way of these amendments. The Examiner acknowledges that Dan fails to teach or suggest a delta table at all. At pages 86-88 Banick makes a general statement that changes are saved to a database. However, there is no teaching or suggestion in the combination of "a delta table associated with a work area that represents changes made in said work area to website content, extended attributes of said website, and information related to said website." Accordingly, even if the above rejection were not improper, it would be overcome by the current rejection.

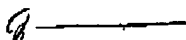
Applicant makes such amendment only for the purpose of clarifying the description of the invention, with a view toward advancing prosecution of the Application. Applicant does not concede the propriety of the Examiner's position, or sacrifice the original scope of the patent protection Applicant feels it is entitled to. In fact, Applicant reserves the right to pursue protection for the subject matter of the claims-as-filed in one or more continuing applications.

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CONCLUSION

In view of the foregoing, Applicant deems the Application to be in allowable condition. Therefore, reconsideration and prompt allowance of the claims is earnestly requested. Should the Examiner deem it helpful, he is respectfully encouraged to contact Applicant's Attorney at 650-474-8400..

Respectfully submitted,



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